

DECLARATION IN SUPPORT OF PLAINTIFF'S MOTION
FOR THE APPOINTMENT OF COUNSEL

Lonnie Thompson states:

1. I am the plaintiff in the above-entitled case. I make this Declaration In Support of my Motion For Appointment of Counsel.
2. The Complaint in this case alleges that the plaintiff was subjected to pain and suffering, deliberate indifference, negligence, wanton disregard for my health and wellbeing by the hands of the defendants named in this case. That all defendants through their actions and/ or inactions by direct and /or indirect participation of the failure to treat the plaintiff's medical serious need for medical attention which is a violation of the 8th amendment.
3. This is a very complexed, medically technical case which contains several different legal claims, with each claim involving a different set of defendants.
4. This case involves a great degree of medical issues which will require a medical expert's testimony.
5. The plaintiff demands a jury trial.
6. This case will definitely require discovery of documents and depositions of a number of witnesses.
7. The plaintiff only has a General Equivalent Diploma.
8. The plaintiff has a very limited access to the needed legal materials due to the restricted amount of time available to inmates at the Richland Correctional Institution's legal library.
9. As set forth in the Memorandum of Law submitted with this motion, these facts along with the legal merits of plaintiff's claims support the Appointment of Counsel to represent the plaintiff and should be granted in the interest of justice.

Wherefore, the plaintiff hopes to have shown good cause and request that this Honorable Court grants this motion.

Pursuant to 28 U.S.C. §1746, I Lonnie Thompson declare under penalty of perjury that the foregoing is true and correct.

Executed on:

03/05/2024

Signature:

Lonnie Thompson